

EXHIBIT I



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June 17, 2022

VIA ELECTRONIC & REGULAR MAIL

Mirel Fisch, Esq.
The Law Office of Mirel Fisch
2329 Nostrand Ave, Suite 100
Brooklyn, New York 11210

Re: O'Hara v. City of New York, et al.
E.D.N.Y. docket no. 17-cv-4766
PRIVILEGE LOG FOR ORIGINAL DISCLOSURES

Dear Ms. Fisch,

Pursuant to our discussion, please accept this correspondence as the Kings County District Attorney's Privilege log for the original 718 pages produced.

Bates No.	Date	Author	Recipient	Privileges	Description
3 – 12	May 16, 2016	Unknown	N/A	Work Product; Law Enforcement Privilege	Accurint Reports: Background check research on potential witness for KCDA re-investigation of O'Hara prosecution
14 - 17	May 20, 2016	Unknown	N/A	Work Product; Law Enforcement Privilege	Accurint Reports: Background check research on potential witness for KCDA re-investigation of O'Hara prosecution
19 - 27	May 16, 2016	Unknown	N/A	Work Product; Law Enforcement Privilege	Accurint Reports: Background check research on potential witness for KCDA re-investigation of O'Hara prosecution
29 – 30	May 16, 2016	Unknown	N/A	Work Product; Law Enforcement Privilege	Accurint Reports: Background check research on potential witness for KCDA re-investigation of O'Hara prosecution

Kings County District Attorney's Office
(E.D.N.Y., docket no. 17-cv-4766; Response to Subpoena)
Page 2 of 5

32 – 44	May 16, 2016	Unknown	N/A	Work Product; Law Enforcement Privilege	Accurint Reports: Background check research on potential witness for KCDA re-investigation of O'Hara prosecution
46 – 88	May 20, 2016	Unknown	N/A	Work Product; Law Enforcement Privilege	Accurint Reports: Background check research on potential witness for KCDA re-investigation of O'Hara prosecution
99	December 11, 2015	Joel Rudin, Esq.	Mark Hale, Esq.	CPL § 160.58	Letter from Joel Rudin to Mark Hale seeking King County Conviction Review Unit investigation. Portion improperly describes criminal case outcome for certain person.
106 – 150	May 18, 2016	Unknown	N/A	Work Product; Law Enforcement Privilege	Accurint Reports: Background check research on potential witness for KCDA re-investigation of O'Hara prosecution
152 – 171	May 16, 2016	Unknown	N/A	Work Product; Law Enforcement Privilege	Accurint Reports: Background check research on potential witness for KCDA re-investigation of O'Hara prosecution
173 - 180	May 16, 2016	Unknown	N/A	Work Product; Law Enforcement Privilege	Accurint Reports: Background check research on potential witness for KCDA re-investigation of O'Hara prosecution

Kings County District Attorney's Office
(E.D.N.Y., docket no. 17-cv-4766; Response to Subpoena)
Page 3 of 5

Bates No.	Date	Author	Recipient	Privileges	Description
182 - 191	May 16, 2016	Unknown	N/A	Work Product; Law Enforcement Privilege	Accurint Reports: Background check research on potential witness for KCDA re-investigation of O'Hara prosecution
193	May 16, 2016	Unknown	N/A	Work Product; Law Enforcement Privilege	Accurint Reports: Background check research on potential witness for KCDA re-investigation of O'Hara prosecution
194 - 225	May 16, 2016	Unknown	N/A	Work Product; Law Enforcement Privilege	Accurint Reports: Background check research on potential witness for KCDA re-investigation of O'Hara prosecution
228 - 250	May 16, 2016	Unknown	N/A	Work Product; Law Enforcement Privilege	Accurint Reports: Background check research on potential witness for KCDA re-investigation of O'Hara prosecution
252 - 254	Unknown	Unknown	N/A	Work Product	Interview notes of two witnesses related to O'Hara matter
255 - 261	May 18, 2016	Unknown	N/A	Work Product; Law Enforcement Privilege	Accurint Reports: Background check research on potential witness for KCDA re-investigation of O'Hara prosecution
354 - 358	Nov. 9, 2016	Unknown	N/A	Work Product; Law Enforcement Privilege	Accurint Reports: Background check research on potential witness for KCDA re-investigation of O'Hara prosecution

Kings County District Attorney's Office
(E.D.N.Y., docket no. 17-cv-4766; Response to Subpoena)
Page 4 of 5

Bates No.	Date	Author	Recipient	Privileges	Description
359	Nov. 9, 2016	Jessica Wilson	Patrick Lanigan	Work Product	Handwritten notes providing confidential identifiers of certain potential witnesses for background checks
360 – 465	Nov. 9, 2016	Unknown	N/A	Work Product; Law Enforcement Privilege	Accurant Reports: Background check research on potential witness for KCDA re-investigation of O'Hara prosecution
469 – 475	Nov. 9, 2016	Unknown	N/A	Work Product; Law Enforcement Privilege	Accurant Reports: Background check research on potential witness for KCDA re-investigation of O'Hara prosecution
488 - 565	May 16, 19, & 20, 2016	Unknown	N/A	Work Product; Law Enforcement Privilege	Accurant Reports: Background check research on potential witnesses for KCDA re-investigation of O'Hara prosecution
566 - 608	May 20, 2016	Unknown	N/A	Law Enforcement Privilege	Criminal background check research on potential witnesses for KCDA re-investigation of O'Hara prosecution
615- 616	May 17, 2016	Unknown	N/A	Work Product; Law Enforcement Privilege	Accurant Reports: Background check research on potential witnesses for KCDA re-investigation of O'Hara prosecution
629	December 11, 2015	Joel B. Rubin	Mark Hale	CPL § 160.55	Letter from Joel Rudin to Mark Hale seeking King County Conviction Review Unit investigation. Portion Describes the termination of a criminal action or proceeding against a person by the conviction of such person of a traffic infraction or a violation.

Kings County District Attorney's Office

(E.D.N.Y., docket no. 17-cv-4766; Response to Subpoena)

Page 5 of 5

643	December 11, 2015	Joel B. Rubin	Mark Hale	CPL §160.50 42 C.F.R. § 2.3 42 C.F.R. § 2.13	Letter from Joel Rudin to Mark Hale seeking King County Conviction Review Unit investigation. Portion describes diversion programs that led to termination of a criminal action or proceeding against a person in favor of such person.
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Very truly yours,

George B. Forbes

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